

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>
<b>THIS DOCUMENT RELATES TO ALL CASES INCLUDING WAVE 1 AND ANY FUTURE WAVE CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**CROSS-NOTICE OF CONTINUATION OF VIDEOTAPED *DE BENE ESSE*  
TESTIMONY OF BRUCE ROSENZWEIG, M.D.**

**TO: ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that the *de bene esse* testimony of Dr. Bruce Rosenzweig, will be taken jointly in connection with *In Re: Pelvic Mesh Litigation*, February Term 2014, No. 829, Court of Common Pleas, Civil Trial Division, Philadelphia, PA and *Carlino v. Ethicon, Inc., et al.*, June Term 2013, No. 03470, Court of Common Pleas, Civil Trial Division, Philadelphia, PA , upon oral examination on January 13, 2016 at 9:00 a.m. at Wexler Wallace, LLP, 55 W. Monroe Street, #3300, Chicago, IL 60603. The notice of deposition is attached hereto as Exhibit A.

**PLEASE TAKE FURTHER NOTICE** that in accordance with Rule 30 of the Federal Rules of Civil Procedure, and the procedures set forth in *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, Plaintiffs hereby cross-notice this testimony for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Plaintiffs further state that this trial examination shall be conducted in accordance with and subject to the Protective Orders entered in *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327.

This videotaped trial examination will be taken before a person authorized by law to administer oaths and be recorded by stenograph.

Dated: January 4, 2016

Respectfully submitted,

/s/Bryan F. Aylstock

Bryan F. Aylstock, Esq.

Daniel Thornburgh, Esq.

Renee Baggett, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: [baylstock@awkolaw.com](mailto:baylstock@awkolaw.com)

[E-mail: rbaggett@awkolaw.com](mailto:rbaggett@awkolaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on January 4, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Bryan F. Aylstock

Bryan F. Aylstock  
Aylstock, Witkin, Kreis and Overholtz, PLC  
17 E. Main Street, Suite 200  
Pensacola, FL 32563  
850-202-1010  
850-916-7449  
[baylstock@awkolaw.com](mailto:baylstock@awkolaw.com)